

Webster, David

D. Webster note
6/30/16

From: dianne.phillips@hklaw.com
Sent: Tuesday, June 07, 2016 8:16 AM
To: Williams, Ann
Cc: Webster, David; Bukhari, Samir; Weitzler, Ellen
Subject: RE: Exxon Mobil NPDES permit MA0000833

Hi Ann,

I am just checking back from our conversation last week. Is there any chance we could come to your office on one of the following days to review the Exxon Mobil permit compliance limits for the last few years (2008 to date)? We want to be sure we are on the same page before responding to CLF. As folks may remember, there was some initial confusion about the compliance limits, especially during the period the contested conditions were stayed. We are available any of the following dates:

- Friday, June 24
- Tuesday, June 28
- Wednesday, June 29
- Thursday, June 30

I am leaving later today for vacation (Norway & Denmark), but will be monitoring e-mail while traveling. I look forward to hearing from you.

Best regards,
Dianne

Dianne Phillips | Holland & Knight

Partner

Holland & Knight LLP

10 Saint James Avenue, 11th Floor | Boston, MA 02116

Phone 617.573.5818 | Fax 617.523.6850 | Cell 339.221.0975

dianne.phillips@hklaw.com | www.hklaw.com

Add to address book | View professional biography

EC10 - new looks correct.
- error to report - mrg report.

2000 2008
01A - ~~TESTS~~ - Some TSS non-compliance - 1 pre-2008
01B - hot to tank - no discharge
01C - New at All Gen Mod → compliance

CLF - Intent to Sue
- alleged violations of 01A of PAHs - during MOD in 2011

From: Phillips, Dianne R (BOS - X75818)
Sent: Thursday, June 02, 2016 6:19 PM
To: 'williams.ann@epa.gov' <williams.ann@epa.gov>
Cc: David Webster <Webster.David@epamail.epa.gov>; 'Bukhari.Samir@epamail.epa.gov' <Bukhari.Samir@epamail.epa.gov>; 'Weitzler.Ellen@epamail.epa.gov' <Weitzler.Ellen@epamail.epa.gov>
Subject: Exxon Mobil NPDES permit MA0000833

Ann,

It was great to speak with you this afternoon. As we discussed, I am writing to request a meeting with you and the folks copied on this e-mail on behalf of our client Exxon Mobil. As I mentioned, the CLF Notice of Intent alleges, among other things, violations of the NPDES permit during the period between issuance of the 2008 permit and the 2011 modification (as well as subsequent alleged violations) which I believe are erroneous. We would like to meet with you to review the permit effluent compliance limits in effect during the relevant period (some of which relate to application of the

contested conditions stay) and confirm EPA's views of the applicable limits. As we discussed, the permit history is complex & we want to be sure we are all on the same page. I appreciate your willingness to assist (subject to scheduling of course).

We are available the following dates (at any time):

- Friday, June 24
- Tuesday, June 28
- Wednesday, June 29
- Thursday, June 30

Would any of those work for you all?

As I mentioned, I am leaving for a vacation out-of-the country next Tuesday (June 7) and would love to get something on the calendar (if possible) before I go. Let me know what you think.

Best regards, Dianne

P.S. I will be monitoring e-mail while away periodically.

Dianne Phillips | Holland & Knight

Partner

Holland & Knight LLP

10 Saint James Avenue, 11th Floor | Boston, MA 02116

Phone 617.573.5818 | Fax 617.523.6850 | Cell 339.221.0975

dianne.phillips@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.